

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of)
the ESTATE OF FRANK E. PAVLIS,)

Plaintiff,)

v.)

KEY COMMERCIAL FINANCE,)
LLC, KEY COMMERCIAL)
FINANCE PROPERTIES, LLC,)
EQUITY PROS, LLC, and MOBILE)
AGENCY, LLC,)

Defendants.)

C.A. No. 1:18-cv-01516-CFC/SRF

JUSTIN BILLINGSLEY and KEY)
COMMERCIAL FINANCE, LLC,)

Third-Party Plaintiffs,)

v.)

DEBORAH S. SKEANS and)
DARBIN SKEANS,)

Third-Party Defendants.)

**MOTION FOR TELECONFERENCE
TO RESOLVE DISCOVERY DISPUTE**

Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis (“Estate of Mr. Pavlis”), respectfully moves the Court to schedule a teleconference to address outstanding discovery disputes relating to defendants’ failure to produce all responsive documents despite not objecting to any of Mr. Pavlis’ discovery requests.

The following attorneys, including Delaware counsel, participated in a verbal meet-and-confer via telephone on February 27, 2020:

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Attorney for Defendants, Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC.

Attorneys for Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis.

Counsel for the Estate of Mr. Pavlis are available for a teleconference on the following dates:

Monday, March 9, 2020

Tuesday, March 10, 2020

Wednesday, March 11, 2020

Based on the foregoing, the Estate of Mr. Pavlis respectfully moves this Court to schedule a teleconference to address outstanding discovery disputes.

STRADLEY RONON
STEVENS & YOUNG, LLP

/s/Joelle E. Polesky

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Dated: February 28, 2020